

ORIGINAL
IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION
U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

UNITED STATES OF AMERICA

v.

CHAZ EMID DIXON (01)
DALE TAYLOR JR (02)

No. 4:22-MJ-734

CLERK U.S. DISTRICT COURT
By: _____
Deputy

SEP - 6 2022

CRIMINAL COMPLAINT

I, United States Postal Inspector Ryan Calvert, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

On September 6, 2022, in the Fort Worth Division of the Northern District of Texas, **Chaz Emid Dixon** and **Dale Taylor Jr.** knowingly and unlawfully possessed a United States Postal Service (USPS) Arrow Key, with the intent to steal mail and were in possession of stolen mail, in violation of 18 U.S.C. §§ 1704 and 1708.

Probable Cause:

1. I am a U.S. Postal Inspector with the U.S. Postal Inspection Service (USPIS), assigned to the Fort Worth Division Mail Theft & Violent Crime Team, and have been so employed since June 2013. I am sworn and empowered to investigate criminal activity involving the USPS. My duties include investigating theft of U.S. Mail, mail fraud, identity theft, access device fraud, bank fraud, and violent crimes committed against USPS employees.

2. On Tuesday September 6, 2022, Inspectors were conducting surveillance of the USPS blue collection box located at 4450 Oak Park Lane, Fort Worth, Texas 76109. Since April 2022, individuals have been using stolen and fraudulently obtained USPS Arrow Keys to open the blue collection boxes and steal mail. The individuals are stealing mail which the contents contain checks which they can sell, alter and/or create counterfeit checks to negotiate at banks at a later time.


3. A USPS Arrow Key is a unique key that is only to be used by employees of the USPS. The key is used by letter carriers and employees to open apartment panels, blue collection boxes, wall units in business buildings, gated communities and community boxes in newer communities. It is a serialized item that is to be checked out every morning and checked in every evening by employees.

4. During the surveillance, I observed a black four door vehicle pull up to the blue collection box. An individual, later identified as **Dixon**, exited the passenger side of the vehicle, opened the USPS blue collection box and removed a tub of mail. At this time, Inspectors arrived and blocked the vehicle from leaving the area and took **Dixon** and the driver, later identified as **Taylor**, into custody.

5. Once the two individuals were in custody, I observed the USPS Arrow Key, serial number 402-13460, still engaged in the lock in the USPS blue collection box. I also observed a tub of mail laying on the ground next to the suspect vehicle. In plain view inside the suspect vehicle, I observed mail not belonging to **Dixon** or **Taylor** in the back seat of the vehicle.

6. **Dixon** agreed to speak with Inspectors. He was read his rights per Miranda and the interview was recorded. **Dixon** stated he received the key from an individual he knows as Cale who he met on Telegram. He stated he rented the key for \$200 and met Cale on Sunday, September 4, 2022, at a park in Arlington, Texas. He stated this was his first time stealing mail. He stated they stole mail from a USPS blue collection box on Camp Bowie in Fort Worth, Texas then they drove to the Trinity River Post Office on Oak Park. He stated his intent was to make money by selling the stolen checks online. **Dixon** stated he asked **Taylor** to drive and stated **Taylor** didn't know what was going on until he opened the first box.

7. Based upon the foregoing facts and information, I respectfully submit that there is probable cause to believe that **Chaz Emid Dixon** and **Dale Taylor, Jr.**, knowingly and unlawfully possessed, and used without lawful authority, a USPS Arrow key, with the intent to steal mail and were in possession of stolen mail, in violation of 18 U.S.C. § 1704 and 1708.



Ryan Calvert
U.S. Postal Inspector
United States Postal Inspection Service

SWORN TO and SUBSCRIBED before me this 6th day of September 2022 at 2:01 p.m. in Fort Worth, Texas.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE